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12 UNITED STATES DISTRICT COURT FOR THE
13 NORTHERN DISTRICT OF CALIFORNIA

14 IN THE MATTER OF THE TAX)
15 LIABILITIES OF:) Civil Number:

16 JOHN DOES, United States person(s), who)
17 directly or indirectly had authority over any) **[PROPOSED] ORDER GRANTING**
18 combination of accounts held with Payward) **EX PARTE PETITION FOR LEAVE TO**
19 Ventures Inc., d/b/a Kraken or Kraken.com, or) **SERVE “JOHN DOE” SUMMONS**
20 its predecessors, subsidiaries, divisions, or)
21 affiliates (collectively, “Kraken”), with at)
22 least the equivalent of \$20,000 in value of)
23 transactions (regardless of type) in)
24 cryptocurrency in any one year, for the period)
25 January 1, 2016 through December 31, 2020.)

26 THIS MATTER is before the Court upon the United States of America’s “Ex Parte Petition for
27 Leave to Serve “John Doe” Summons” (the “Petition”). Based upon a review of the Petition and
supporting documents, the Court has determined that the “John Doe” summons to Payward Ventures,
Inc., and Subsidiaries relates to the investigation of an ascertainable group or class of persons, that there
is a reasonable basis for believing that such group or class of persons has failed or may have failed to
comply with any provision of any internal revenue laws, that the information sought to be obtained from
the examination of the records (and the identities of the persons with respect to whose liability the
summons is issued) is not readily available from other sources, and that the information sought to be
obtained is narrowly tailored to information that pertains to the failure or potential failure of that group
or class of persons to comply with one or more provisions of the internal revenue laws. It is therefore:

[Proposed] Order Granting Ex Parte Petition
For Leave to Serve “John Doe” Summons

1 ORDERED AND ADJUDGED that the Internal Revenue Service, through Revenue Agent
2 Karen Cincotta or any other authorized officer or agent, may serve an Internal Revenue Service John
3 Doe summons upon Payward Ventures, Inc., and Subsidiaries in substantially the form as attached as
4 Exhibit A to the Declaration of Karen Cincotta. A copy of this Order shall be served together with the
5 summons.

6 IT IS SO ORDERED this ____ day of _____, 2021.
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UNITED STATES DISTRICT JUDGE
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